

EXHIBIT A



Service of Process Transmittal

01/08/2021

CT Log Number 538860038

TO: Viraj Telang
Lyft, Inc.
185 BERRY ST STE 5000
SAN FRANCISCO, CA 94107-2503

RE: Process Served in Nevada

FOR: Lyft, Inc. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Ethan Rodriguez, etc., Pltf. vs. Lyft, Inc., etc., et al., Dfts.

DOCUMENT(S) SERVED: Summons, Complaint

COURT/AGENCY: Clark County District Court, NV
Case # A21827443C

NATURE OF ACTION: Personal Injury - Vehicle Collision - 03/12/2019

ON WHOM PROCESS WAS SERVED: C T Corporation System, Carson City, NV

DATE AND HOUR OF SERVICE: By Process Server on 01/08/2021 at 12:30

JURISDICTION SERVED : Nevada

APPEARANCE OR ANSWER DUE: within 20 days after this Summons is served on you, exclusive of the day of service (Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): STEVEN M. ROGERS
HICKS & BRASIER, PLLC
2630 S. Jones Blvd.
Las Vegas, NV 89146
(702) 628-9888

ACTION ITEMS: CT has retained the current log, Retain Date: 01/11/2021, Expected Purge Date: 01/16/2021

Image SOP

Email Notification, Adrienne Young adrienneyoung@lyft.com

Email Notification, John Pellegrini jpellegrini@lyft.com

Email Notification, Sam Gall sgall@lyft.com

Email Notification, Arielle Stephenson astephenson@lyft.com

Email Notification, Sop Connector gdouglas@lyft.com

Email Notification, Viraj Telang virajt@lyft.com

Email Notification, Adam Jacobs ajacobs@lyft.com



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185 BERRY ST STE 5000
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REGISTERED AGENT ADDRESS:

C T Corporation System
701 S. Carson Street
Suite 200
Carson City, NV 89701

877-564-7529

MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

SUMM

DISTRICT COURT
CLARK COUNTY, NEVADA

ETHAN RODRIGUEZ, individually,

Plaintiff,

—VS. —

LYFT, INC. a Foreign Corporation; DOE DRIVER;
DOES I through X, inclusive; ROE CORPORATIONS
XI through XX, inclusive,

Defendants.

CASE NO.: A-21-827443-C
DEPT. NO.: 1

SUMMONS

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR
BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW**

To THE DEFENDANT(S): A civil Complaint has been filed by the Plaintiff(s) against you for the relief set forth in the Complaint.

LYFT, INC.

1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day of service, you must do the following:

- a. File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee.
- b. Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and this Court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.

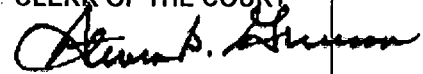
3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators, each have 45 days after service of this summons within which to file an answer or other responsive pleading to the complaint.

Issued at the direction of
HICKS & BRASIER, PLLCSTEVEN D. GRIERSON
CLERK OF COURTBy: /s/ Steven M. RogersSteven M. Rogers, Esq.
2630 S. Jones Blvd.
Las Vegas, NV 89146
Attorneys for Plaintiff

Robyn Rodriguez 1/7/2021
Deputy Clerk Date
County Court House
200 Lewis Avenue
Las Vegas, Nevada 89155
Robyn Rodriguez

NOTE: When service is by publication, add a brief statement of the object of the action. See NRCP 4(b). Revised 03/99/jb

**COMP**

STEVEN M. ROGERS, ESQ.

Nevada Bar No. 10975

HICKS & BRASIER, PLLC

2630 S. Jones Blvd.

Las Vegas, Nevada 89146

Phone: (702) 628-9888

Fax: (702) 960-4118

E-Mail: srogers@lvattorneys.com*Attorney for Plaintiff*

CASE NO: A-21-827443-C

Department 1

DISTRICT COURT**CLARK COUNTY, NEVADA**

ETHAN RODRIGUEZ, individually,

Plaintiff,

vs.

LYFT, INC. a Foreign Corporation; DOE
DRIVER; DOES I through X, inclusive;
ROE CORPORATIONS XI through XX,
inclusive,

Defendants.

CASE NO.:

DEPT. NO.:

COMPLAINT**PLAINTIFF'S COMPLAINT**

Plaintiff ETHAN RODRIGUEZ, by and through his attorney of record, STEVEN M. ROGERS, ESQ., of HICKS & BRASIER, PLLC, and for his causes of action against Defendants, and each of them, complains and alleges as follows:

GENERAL ALLEGATIONS

1. That Plaintiff ETHAN RODRIGUEZ (hereinafter "Plaintiff") is, and at all times mentioned herein, was, a resident of the County of Clark, State of Nevada.

2. That Defendant LYFT, INC. is, and at all times mentioned herein, was a foreign Corporation, licensed to do business in the County of Clark, State of Nevada

1 3. That Defendant DOE DRIVER was at all times mentioned herein a resident of the
2 State of Nevada.

3 4. That the true names and capacities of the Defendants designated herein as Doe
4 individuals or Roe Corporations are presently unknown to Plaintiff at this time, who therefore
5 sues said Defendants by such fictitious names. When the true names and capacities of these
6 defendants are ascertained, Plaintiff will amend this Complaint accordingly.

7 5. That at all times pertinent, Defendants were agents, servants, employees or joint
8 venturers of every other Defendant herein, and at all times mentioned herein were acting within
9 the scope and course of said agency, employment, or joint venture, with knowledge and
10 permission and consent of all other named Defendants.

11 6. That Plaintiff is, and at all times mentioned herein, was a passenger in a vehicle
12 driven by Defendant DOE DRIVER.

13 7. That on March 12, 2019, in Clark County, Nevada, Defendant DOE DRIVER while
14 in the course and scope of his employment with Defendant, LYFT, INC., negligently operated
15 the Vehicle, causing a collision, or incident, resulting in injuries to Plaintiff.

16 8. As a direct and proximate result of the negligence of Defendants, Plaintiff sustained
17 injuries, all or some of which conditions may be permanent and disabling, and all to Plaintiffs'
18 damage in a sum in excess of \$15,000.

19 9. That as a direct and proximate result of the negligence of Defendant, Plaintiff
20 received medical and other treatment for the aforementioned injuries, and that said services,
21 care, and treatment are continuing and shall continue in the future, all to the damage of Plaintiff.

22 10. That as a direct and proximate result of the negligence of Defendant, Plaintiff has
23 been required to, and has limited occupational and recreational activities, which have caused
24 and shall continue to cause Plaintiff loss of earning capacity, lost wages, physical impairment,
25 mental anguish, and loss of enjoyment of life, in a presently unascertainable amount.

26 11. That as a direct and proximate result of the aforementioned negligent of all
27 Defendants, Plaintiff has been required to engage the services of an attorney, incurring
28 attorney's fees and costs to bring this action.

FIRST CAUSE OF ACTION

(Negligence)

12. Plaintiff incorporates paragraphs 1 through 11 of this Complaint as though fully set forth herein.

13. Defendant DOE DRIVER owed Plaintiff a duty of care to operate his vehicle in a reasonable and safe manner.

14. The acts of Defendant DOE DRIVER, as described herein, violated the traffic laws of the State of Nevada and Clark County, constituting negligence per se.

15. Plaintiff belongs to a class of persons that the traffic laws of the State of Nevada and Clark County were designed to protect.

16. Defendant DOE DRIVER breached that duty of care by causing an accident, or incident, that caused Plaintiff injuries.

17. As a direct and proximate result of Defendants' negligence and violation of law, Plaintiff was physically injured and received medical and other treatment for said injuries. Medical services, care, and treatment are continuing and will continue in the future, all to Plaintiff's detriment.

18. As a direct and proximate result of Defendants' negligence and violation of law, Plaintiff has been forced to engage in limited occupational and recreational activities, which have caused and shall continue to cause Plaintiff a loss in his earning capacity, lost wages, physical impairment, mental anguish, and loss of enjoyment of life, in an amount that is presently unascertainable.

19. As a direct and proximate result of Defendants' negligence and violation of law, Plaintiff has been damaged in an amount in excess of \$15,000.00.

20. As a direct and proximate result of Defendants' negligence and violation of law, Plaintiff has been forced to retain the services of an attorney, incurring attorney's fees and costs to bring this action.

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SECOND CAUSE OF ACTION

(Negligent Hiring and Retention)

21. Plaintiff incorporates paragraphs 1 through 23 as though fully set forth herein.

22. Defendant Lyft owed a duty of care to Plaintiff to use reasonable care in the hiring of its employees.

23. Defendant Lyft breached that duty by hiring Defendant DOE DRIVER even though it knew, or through the exercise of reasonable care should have known, of Defendant DOE DRIVER's dangerous propensities, inexperience, or incompetence.

24. Defendant Lyft owed a duty of care to Plaintiff to use reasonable care in the hiring and retention of its employees.

25. Defendant Lyft breached that duty by failing to reasonably hire or retain Defendant DOE DRIVER due to Defendant DOE DRIVER's inability to properly and safely perform Defendant DOE DRIVER's duties.

26. As a direct and proximate result of the negligent hiring and retention by Defendant Lyft, concurring with the negligent acts of Defendant DOE DRIVER, Plaintiff has been damaged in an amount in excess of \$15,000.00.

THIRD CAUSE OF ACTION

(Negligent Training and Supervision)

27. Plaintiff incorporates paragraphs 1 through 26 as though fully set forth herein.

28. Defendant Lyft owed a duty of care to Plaintiff to use reasonable care in the training of its employees.

29. Defendant Lyft breached that duty by failing to reasonably train Defendant DOE DRIVER regarding Defendant DOE DRIVER's duties and/or operating Defendant's Vehicle.

30. Defendant Lyft owed a duty of care to Plaintiff to use reasonable care in the training and supervision of its employees.

31. Defendant Lyft breached that duty by failing to reasonably train and supervise Defendant DOE DRIVER regarding Defendant DOE DRIVER's performance of work duties and operating the Cab.

1. For general damages sustained by Plaintiff in an amount in excess of \$15,000.00;
2. For special damages sustained by Plaintiff in an amount in excess of \$15,000.00;
3. For reasonable attorney's fees and costs;
4. For interest at the statutory rate; and
5. For such other relief as the Court deems just and proper.

/s/ Steven M. Rogers
STEVEN M. ROGERS, ESQ.
Nevada Bar No. 10975
2630 S. Jones Blvd.
Las Vegas, Nevada 89146
Attorneys for Plaintiff